HACKERSTEPHENS_{III}

Andrew B. Stephens

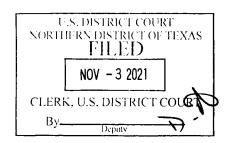
Partner

O (512) 399-3022 Andrew@HackerStephens.com

November 2, 2021

United States District Clerk United States District Court 205 SE 5th Avenue, Room 133 Amarillo, Texas 79101

Via UPS



Re:

[SEALED] United States of America ex rel. Alex Doe, Relator, et al. v. Planned Parenthood Federation of America, Inc., et al.; Civil Action No. 2:21-CV-022-Z; United States District Court for the Northern District of Texas, Amarillo Division

Dear District Clerk:

Please issue the attached six (6) summonses to Defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., in the above-referenced federal False Claims Act case.

Kindly return the summonses to my email listed above at your earliest convenience. The summonses, Complaint, the State of Texas's Notice of Election to Intervene, and the United States of America's Declination Notice will be served on Defendants after these documents are unsealed by order of the Court on or after November 4, 2021, as proposed by the United States in their Declination Notice and Proposed Order.

Please contact me if you have any questions or need additional information. Thank you very much for your assistance.

Sincerely,

Andrew B. Stephens

United States District Clerk November 2, 2021 Page 2

cc (via U.S. Mail and Email):

J. Scott Hogan Assistant United States Attorney 1100 Commerce Street, Third Floor Dallas, Texas 75242 scott.hogan@usdoj.gov

Yolanda Y. Campbell Attorney, Civil Division U.S. Department of Justice P.O. Box 261, Ben Franklin Station Washington, DC 20044 yolanda.y.campbell@usdoj.gov

Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
raymond.winter@oag.texas.gov

Halie E. Daniels
Assistant Attorney General
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
halie.daniels@oag.texas.gov

Nicholas J. Diez Assistant Attorney General Medicaid Fraud Control Unit Office of Attorney General Jeff Landry Attorney General of Louisiana diezn@ag.louisiana.gov

Northern D	istrict of Texas
United States of America, ex rel. Doe, Relator, The State of Texas, ex rel. Doe, Relator, The State of Louisiana, ex rel. Doe, Relator, Plaintiff(s) V. Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc., Defendant(s)))))) Civil Action No. 2:21-cv-00022-Z))))
SUMMONS IN	A CIVIL ACTION
To: (Defendant's name and address) Planned Parenthood Federal Court 123 Williams Street New York, New York 1003	nsel
A lawsuit has been filed against you.	
are the United States or a United States agency, or an offic	
If you fail to respond, judgment by default will be You also must file your answer or motion with the court.	entered against you for the relief demanded in the complaint.
	CLERK OF COURT
Date:	Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

ceived by me on (date)			
☐ I personally served	the summons on the individual	at (place)	
		on (date)	; or
☐ I left the summons a	at the individual's residence or	usual place of abode with (name)	
	, a perso	on of suitable age and discretion who res	sides there,
on (date)	, and mailed a copy to	the individual's last known address; or	
☐ I served the summo	ns on (name of individual)		, who
designated by law to a	ccept service of process on beh		
		on (date)	; or
☐ I returned the summ	ons unexecuted because		; (
☐ Other (specify):			
My fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under penalty	of perjury that this information	n is true.	
		Company's signature	
		Server's signature	
		Printed name and title	
		Server's address	

	Northern Distri	ict of Texas
United States of America, ex rel. Do The State of Texas, ex rel. Doe, I The State of Louisiana, ex rel. Doe Plaintiff(s) V. Planned Parenthood Federation of Am Planned Parenthood Gulf Coast Planned Parenthood of Greater Tex Planned Parenthood South Texas Planned Parenthood Cameron Cou Planned Parenthood San Antonio Defendant(s)	Relator, P. Relator,) nerica, Inc., , Inc., s, Inc., nty, Inc.,)	Civil Action No. 2:21-cv-00022-Z
	SUMMONS IN A	CIVIL ACTION
4600	ed Parenthood Gulf Coa ney Linton, Registered A Gulf Freeway ton, Texas 77023	•
A lawsuit has been filed agair	nst you.	
are the United States or a United State P. 12 (a)(2) or (3) — you must serve of the Federal Rules of Civil Procedure. whose name and address are: Andre Heath Hacke 108 W	es agency, or an officer on the plaintiff an answe	(not counting the day you received it) — or 60 days if you or employee of the United States described in Fed. R. Civ. or to the attached complaint or a motion under Rule 12 of must be served on the plaintiff or plaintiff's attorney,
If you fail to respond, judgme You also must file your answer or mo		ered against you for the relief demanded in the complaint.
		CLERK OF COURT
Date:		Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

	he summons on the individual at		
		on (date)	; or -
☐ I left the summons a	t the individual's residence or us	· —	
		of suitable age and discretion who res	
on (date)	, and mailed a copy to the	ne individual's last known address; or	
☐ I served the summor	ns on (name of individual)		, who
designated by law to ac	ccept service of process on behal	f of (name of organization)	
		on (date)	; or
☐ I returned the summer	ons unexecuted because		;
☐ Other (specify):			
My fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under penalty	of perjury that this information i	s true.	
		Server's signature	
		Printed name and title	

	Northern Distr	ict of Texas
United States of America, ex The State of Texas, ex re The State of Louisiana, ex Plaintiff(s) V. Planned Parenthood Federatic Planned Parenthood of Gre Planned Parenthood Sou Planned Parenthood Came Planned Parenthood San Defendant(s	of. Doe, Relator, rel. Doe, Relator,) on of America, Inc., If Coast, Inc., ater Texas, Inc., th Texas, Inc., ron County, Inc., Antonio, Inc.,)	Civil Action No. 2:21-cv-00022-Z
	SUMMONS IN A	CIVIL ACTION
To: (Defendant's name and address)	Planned Parenthood of Grea Kenneth Lambrecht, Register 7424 Greenville Avenue, Suit Dallas, Texas 75231	red Agent
A lawsuit has been filed	d against you.	
are the United States or a Unite P. 12 (a)(2) or (3) — you must the Federal Rules of Civil Proce	d States agency, or an officer serve on the plaintiff an answ	(not counting the day you received it) — or 60 days if you or employee of the United States described in Fed. R. Civ. er to the attached complaint or a motion under Rule 12 of must be served on the plaintiff or plaintiff's attorney, Suite 250
If you fail to respond, jo You also must file your answer		tered against you for the relief demanded in the complaint.
		CLERK OF COURT
Date:		Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

	of individual and title, if any)		
ceived by me on (date)			
☐ I personally served the	he summons on the individual at	(place)	
		on (date)	; or
☐ I left the summons at	t the individual's residence or us	ual place of abode with (name)	-
		of suitable age and discretion who res	sides there,
on (date)	, and mailed a copy to th	e individual's last known address; or	
☐ I served the summon	S ON (name of individual)		, who
designated by law to ac	ccept service of process on behal	f of (name of organization)	
		on (date)	; or
☐ I returned the summo	ons unexecuted because		; c
☐ Other (specify):			
My fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under nenalty	of perjury that this information is	s true	
r deciare under penanty	or perjury that this information is	s true.	
		Server's signature	
		Printed name and title	
		Printed name and title	

	Northern District of Texas
United States of America, ex rel. Doe, Related The State of Texas, ex rel. Doe, Related The State of Louisiana, ex rel. Doe, Related Plaintiff(s) V. Planned Parenthood Federation of American Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc., Defendant(s)	Civil Action No. 2:21-cv-00022-Z , Inc.,) nc.,) nc.,)
•	SUMMONS IN A CIVIL ACTION
	SUMMONS IN A CIVIL ACTION
2140 Babo	ns, Registered Agent
A lawsuit has been filed against yo	ou.
are the United States or a United States age P. 12 (a)(2) or (3) — you must serve on the the Federal Rules of Civil Procedure. The whose name and address are: Andrew B. Heather G. Hacker Ste	i. Hacker ephens LLP Basin Road South, Suite 250
If you fail to respond, judgment by You also must file your answer or motion	y default will be entered against you for the relief demanded in the complaint. with the court.
	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

ceived by me on (date)	•		
☐ I personally served	the summons on the individual at	(place)	
		on (date)	; or
☐ I left the summons	at the individual's residence or us	ual place of abode with (name)	
	, a person	of suitable age and discretion who res	sides there,
on (date)	, and mailed a copy to th	e individual's last known address; or	
☐ I served the summo	ons on (name of individual)		, who i
designated by law to	accept service of process on behal-		
		on (date)	; or
☐ I returned the summ	nons unexecuted because		; 01
Other (specify):			
My fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under penalty	of perjury that this information is	s true.	
·		Server's signature	
		server's signature	
		Printed name and title	
	**************************************	Server's address	

for the

Northern District of Texas

	Northern	i District of Texas
United States of America, e The State of Texas, ex n The State of Louisiana, ex Plaintiff(s V. Planned Parenthood Federati Planned Parenthood of Gre Planned Parenthood Sou Planned Parenthood Came Planned Parenthood Came Planned Parenthood Sau	on of America, Inc., attraction Texas, Inc., attraction Texas, Inc., aron County, Inc.,)))) Civil Action No. 2:21-cv-00022-Z))
Defendant((s))
	SUMMONS	IN A CIVIL ACTION
To: (Defendant's name and address)	Planned Parenthood Co Polin C. Barraza 2140 Babcock Road San Antonio, Texas 78	
A lawsuit has been file	d against you.	
are the United States or a United P. 12 (a)(2) or (3) — you must	ed States agency, or an or serve on the plaintiff an	n you (not counting the day you received it) — or 60 days if you fficer or employee of the United States described in Fed. R. Civ. answer to the attached complaint or a motion under Rule 12 of otion must be served on the plaintiff or plaintiff's attorney, outh, Suite 250
If you fail to respond, j You also must file your answer		be entered against you for the relief demanded in the complaint. t.
		CLERK OF COURT
Date:		Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

Inis summons for (name	of individual and title, if any)		
eceived by me on (date)	·		
☐ I personally served the	ne summons on the individual at	(place)	
		on (date)	; or
☐ I left the summons at	the individual's residence or us	ual place of abode with (name)	
	, a person	of suitable age and discretion who res	sides there,
on (date)	, and mailed a copy to th	ne individual's last known address; or	
☐ I served the summon	s on (name of individual)		, who
designated by law to ac	cept service of process on behal	f of (name of organization)	
		on (date)	; or
☐ I returned the summo	ons unexecuted because		;
☐ Other (specify):			
My fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under penalty	of perjury that this information i	s true.	
		Server's signature	
		Printed name and title	

for the

Northern District of Texas

	Northern L	District of Texas
United States of America, et The State of Texas, ex rather State of Louisiana, ex Plaintiff(s. V. Planned Parenthood Federat Planned Parenthood of Granned Parenthood Sol Planned Parenthood Came Planned Parenthood Came Planned Parenthood Sal Defendant	el. Doe, Relator, rel. Doe, Rela)))) Civil Action No. 2:21-cv-00022-Z))))
	SUMMONS IN	N A CIVIL ACTION
To: (Defendant's name and address)	Planned Parenthood San Jeffrey Hons, Registered 2140 Babcock Road San Antonio, Texas 7822	Agent
A lawsuit has been file	d against you.	
are the United States or a United P. 12 (a)(2) or (3) — you must	ed States agency, or an offi serve on the plaintiff an ar	you (not counting the day you received it) — or 60 days if you cer or employee of the United States described in Fed. R. Civ. aswer to the attached complaint or a motion under Rule 12 of ion must be served on the plaintiff or plaintiff's attorney, atth, Suite 250
If you fail to respond, You also must file your answer		e entered against you for the relief demanded in the complaint.
		CLERK OF COURT
Date:		
		Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

☐ I personally served	the summons on the individual at	(place)	
		on (date)	; or
☐ I left the summons	at the individual's residence or us	ual place of abode with (name)	
	, a person	of suitable age and discretion who res	sides there,
on (date)	, and mailed a copy to th	ne individual's last known address; or	
☐ I served the summo	ns on (name of individual)		, who
designated by law to	accept service of process on behal	f of (name of organization)	
		on (date)	; or
☐ I returned the sumr	nons unexecuted because		- ; c
☐ Other (specify):			
Cinci (specify).			
My fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under penalt	of perjury that this information is	s true.	
I declare under penalt	of perjury that this information is	s true.	
I declare under penalty	of perjury that this information i		
I declare under penalt	of perjury that this information is	Server's signature	
I declare under penalt	of perjury that this information i		